TALKIN, MUCCIGROSSO & ROBERTS, L.L.P.

40 EXCHANGE PLACE 18th FLOOR NEW YORK, NEW YORK 10005 PHONE:(212) 482-0007 FAX: (212) 482-1303 www.talkinlaw.com EMAIL: info@talkinlaw.com

Maryland Office: 5100 Dorsey Hall Drive Suite 100 Ellicott City, MD 21042 (410) 964-0300 New Jersey Office: 2500 Plaza 5 Harborside Financial Center Jersey City, NJ 07311 (201) 342-6665

January 21, 2021

Honorable Margo K. Brodie United States District Judge Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

BY ECF

Re: <u>United States v. Steven Nerayoff & Michael Hlday</u>

20 Cr. 008 (MKB)

Dear Judge Brodie:

Defendants Steven Nerayoff and Michael Hlday ("Defendants") submit this joint letter to respectfully request and adjournment of the conference currently scheduled for February 5, 2021 to March 5, 2021 or to another date convenient to the Court. The parties are currently engaged in plea negotiations and defend Hlday is still reviewing the discovery materials. Defendants consent to the exclusion of the time from February 5, 2021 to the date set for the next conference from Speedy Trial Act calculation. The government consent to the Defendants' application.

Thank you for your Honor's consideration of this request.

Very truly yours, Sanford Talkin Sanford Talkin

cc: AUSA Andrey Spektor (by ECF)
AUSA Mark Bini (by ECF)
Arthur Aidala, Esq. (by ECF)